

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY**

MATTHEW GIBSON,

Plaintiff,

vs.

Civil Action No. 5:21-cv-00181

Honorable Frank W. Volk

LOUISE E. GOLDSTON, individually,
COUNTY COMMISSION OF RALEIGH
COUNTY, a political subdivision,
JEFF MCPEAKE, individually,
BRIAN WHITE, individually,
BOBBY STUMP, individually,

Defendants.

PLAINTIFF'S PROPOSED JURY VERDICT FORM

Now comes the Plaintiff, Matthew Gibson, by counsel, John H. Bryan, and hereby submits for the Court's consideration the following proposed jury instructions. Plaintiff reserves the right to submit modified jury instructions to conform to the evidence presented at trial in the event it warrants modified jury instructions.

VERDICT FORM

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2. We, the jury find that a Defendant, or Defendants, violated Matthew Gibson's federal constitutional rights on March 4, 2020.

_____ Yes

_____ No

If you marked "yes" to question 2, please identify which of the following Defendants violated Matthew Gibson's federal constitutional rights on March 4, 2020:

_____ Louise E. Goldston

_____ Jeff McPeake

_____ Bobby Stump

_____ Raleigh County Commission

If you answered “No” to all of the above questions, you have determined that none of the defendants have violated Matthew Gibson’s federal constitutional rights. Please have the foreperson sign and date below. However, if you answered “Yes” to any of the above questions, please continue.

We find Matthew Gibson’s damages to be:

\$_____ (state the amount, or if you find the Plaintiff’s damages have no monetary value, state the nominal amount of \$1.00).

Note: You may not award punitive damages against any Defendant unless you have first found against a Defendant and awarded the Plaintiff nominal or actual damages.

We assess punitive damages as follows:

(state the amount or, if none, write the word “none”).

\$_____ Louise E. Goldston

\$_____ Jeff McPeake

\$_____ Bobby Stump

\$_____ Raleigh County Commission

DATE

JURY FOREPERSON

MATTHEW GIBSON,
By Counsel

/s John H. Bryan
John H. Bryan (WV Bar No. 10259)
JOHN H. BRYAN, ATTORNEY AT LAW
411 Main Street
P.O. Box 366
Union, WV 24983
(304) 772-4999
Fax: (304) 772-4998
jhb@johnbryanlaw.com

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Defendant.

CERTIFICATE OF SERVICE

I, John H. Bryan, do hereby certify that I have delivered a true copy of the foregoing
PLAINTIFFS' PROPOSED JURY VERDICT FORM has been served upon counsel of record by
using the CM/ECF System, this the 11th day of July, 2022 and addressed as follows:

Jennifer E. Tully, Esq.
Adam K. Strider, Esq.
Bailey & Wyant, PLLC
500 Virginia Street, East, Suite 600
PO Box 3710
Charleston, WV 25337-3710
Counsel for Louise E. Goldston

J. Victor Flanagan, Esq.
Kevin J. Robinson, Esq.
Pullin Fowler Flanagan, Brown & Poe, PLLC
252 George Street
Beckley, WV 25801
Counsel for Raleigh County Defendants

/s John H. Bryan

John H. Bryan (WV Bar No. 10259)

JOHN H. BRYAN, ATTORNEYS AT LAW

411 Main Street

P.O. Box 366

Union, WV 24983

(304) 772-4999

Fax: (304) 772-4998

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